



Our ref: 43320

21 May 2018

**Attn: The Secretary
Neighbourhood Plan Steering Group**

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Dear Sir or Madam,

**REGULATION 14 CONSULTATION ON THE DRAFT OUNDLE NEIGHBOURHOOD PLAN (ONP):
REPRESENTATIONS IN RELATION TO FLETTON FIELD, GLAPTHORN ROAD, OUNDLE.**

We write to provide our representations in relation to the above site ('the site'), owned by Northamptonshire County Council (NCC). These comments also follow our meetings on the 6th February and 23rd April 2018 with members of the Neighbourhood Planning Group and other interested parties, where we discussed the site and agreed to set out our views in written representations to the draft ONP.

The Site

The site, denoted by the red edge on the enclosed drawings, is some 0.7 hectares in area and sits on the northern edge of Oundle town centre, with an approved access from Glapthorn Road. It was formally the playing field for Oundle CE Primary School, which has now re-located to the northern edge of Oundle.

Proposed development of the site

Before we comment on the contents of the Neighbourhood Plan, we would like to set out NCC's current proposals for the re-development of the site, as shown on the drawings attached.

The drawings show two sketch options, both of which would deliver 50 extra care apartments, (with one apartment being for visiting guests). In preparing these options we have had regard to:

- The well-established need and demand for additional extra care accommodation in Oundle and the district as a whole;
- The suitability of the site for such development, in the light of its town centre location and very close proximity to medical, shopping and community facilities;
- The relationship between the site and nearby listed buildings and the Conservation Area to the south;
- ENC's refusal of permission in 2015 for 13 dwellings on the site and the reasons for refusal;
- ENC's designation of the site in 2016 as an Asset of Community Value;
- The independent Inspector's recommendation in 2017, following a lengthy Inquiry, that the site should not be added to the list of Town and Village Greens;
- The policies in the adopted Development Plan and the emerging draft Neighbourhood Plan (including the Oundle Town Design Statement 2018), together with the emerging Part 2 Local Plan and its evidence base;



- Informal discussions held with Members of Oundle Town Council, the Neighbourhood Plan Group and ENC/NCC officers and Members during February – April 2018; and
- The reasons given for refusal by ENC in April 2018 of applications to expand the care accommodation at Abbott House, immediately to the north of the site.

Option 1

- This is mainly 2 storeys with a small 3 storey element. If this option was limited entirely to 2 storeys it would achieve 45 units.
- 62% of units are 1 bed, 38% are two beds.
- There are communal gardens to the south side, which also act as a buffer to the Oundle School Chapel to the south.
- There is a footpath link from the existing gate in the north-west corner, which links to the communal gardens, which could be used by the public, dog walkers etc.
- Ground floor units have private garden areas in front, which also act as a privacy buffer.
- Parking has been kept to the eastern side of the site, which also forms a buffer between the development and the semi-detached houses fronting Glapthorn Road. This is a town centre location where there is a strong sustainability case for reduced parking provision, hence we show 25 spaces which equates to roughly one space per 3 units plus eight staff / visitor spaces.
- Communal rooms have been kept to the front of the site, with lounge and hobby rooms opening on to a south facing communal terrace.

Option 2

- This is 3 storeys with an equal split of 1 and 2 bed apartments.
- If the option was reduced to 2 storeys for the south eastern 'wing', it would achieve 42 units.
- There are communal gardens to the south side, which also acts as a buffer to the Oundle School Chapel to the south.
- There can be a route through from the existing gate in the north-west corner to the communal gardens, which could be used by the public, dog walkers etc.
- Ground floor units have private garden areas in front, which also act as a privacy buffer.
- Parking extends further into the site and allows 1 space per unit to be achieved, albeit with slightly reduced visitor allocation at 0.24 spaces per unit. Locating it at the west of the site retains inter-visibility between Magdalene House and the Oundle School Chapel.
- Communal facilities are more centrally located within the scheme and the lounge also opens out onto the south-facing communal terrace.

The site is likely to be brought forward through a partnership between an extra care provider and Northamptonshire County Council, and in consultation with the Neighbourhood Planning Group and East Northamptonshire DC (ENDC). These proposals are currently being developed and therefore it is important that a supportive policy framework is put in place to provide certainty to all parties involved.

Detailed Comments on the Regulation 14 draft Oundle Neighbourhood Plan

The Neighbourhood Planning (General) Regulations 2012, Part 5, Neighbourhood Development Plans, specify the requirements for a Regulation 14 consultation. In this context, we seek clarification of whether the Plan, as presented on the Town Council's website, conforms with the above Regulations, for the following reasons:



1. it does not appear to be accompanied by a suitable policies map, nor a statement “*explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Act.*”
2. its evidence base, in the form of various Background Papers appears incomplete (eg. many of the Papers are missing several sections, including the Green Space Paper) and is not up-to-date, having been prepared in 2014 or earlier; and
3. no SEA or SA Screening Request appears to have been made to ENDC.

We also have the following objections to the draft Plan.

4. The Plan identifies the Fletton Field site as a Local Green Space under policy O.2. However, it does not meet the requirements for such set out in paragraph 77 of the NPPF in that there is insufficient evidence that the site is “demonstrably special to a local community and holds a particular local significance”, based on the following:
 - a) The independent Inspector’s recommendation in 2017, following a Public Inquiry, that the site should not be added to the list of Town and Village Greens;
 - b) The re-location of Oundle CE Primary School to the northern end of the town in 2016;
 - c) The absence of a Background Paper describing the role that the site plays as Local Green Space; and
 - d) ENDC’s 2017 Open Spaces Study does not list the site as being required to meet the open space needs of Oundle.
5. The Fletton Field site was put forward by NCC as a suitable housing allocation site in 2015 but it does not appear to have been assessed as a potential housing site as part of the ONP process.

In the light of the above objections and for the reasons given elsewhere in this statement, the Fletton Field site should be allocated under policy O.16 of the Plan for residential development of around 50 extra care apartments.

This will enable sufficient flexibility to support a deliverable scheme, whilst providing reassurance that the nature of the development will provide an appropriate level of extra care accommodation for the elderly. Furthermore, it will also ensure the ONP meets the required basic conditions at Examination in being consistent with Policies 29 and 30 of the North Northamptonshire Joint Core Strategy (JCS).

Evidence of the Pressing Need for Retirement Accommodation

There is clear evidence to support the pressing need for both private market dwellings and specialist accommodation for the elderly within Oundle and across East Northamptonshire more widely.

This is recognised in draft ONP policy O.17 which refers to:

- a) The requirement for housing proposals to accord with up-to-date evidence of housing need; and
- b) A requirement for town centre sites to place particular emphasis on meeting the housing needs of older people.

Paragraph 5.58 of the Plan recognises the particular need for 1 or 2 bedroomed homes as described in the Oundle Ward Housing Needs and Mix Assessment (OWHNA) produced in March 2016. Indeed, the OWHNA identified that 69 per cent of housing stock in the Oundle ward had 3 bedrooms or more. However, despite this larger existing stock of dwellings within the ward, 67 per cent of all households contain either one or two occupants. Even allowing for some need for spare rooms within a household, this suggests a significant under-occupation of much of the ward’s housing stock, and that there is limited available housing stock for ageing occupants to downsize to, should they wish to. An analysis in the OWHNA of the existing housing market stock coming



onto the market in March 2016 identified that there were no one bedroom properties available within the ward and only 6 two bedroom properties. Furthermore, of the planned new dwellings in the ward (as at March 2105), 69 per cent of them involved three bedroom properties or more.

More recently, the 'Study of Housing Support and Support Needs of Older People Across Northamptonshire' (SHSNOP) report was compiled by Three Dragons and Associates on behalf of a partnership of seven of the Northamptonshire Districts, NCC and the two Clinical Commissioning Groups (CCGs) operating within Northamptonshire. The intention of the study is to build on NCC's Older Persons Accommodation Strategy and to form part of the evidence base for local plans. Specifically, it sets out the current demand for, and supply of, accommodation for the elderly and highlights emerging models of provision, including specialist accommodation. It has also established a 'toolkit' to estimate future needs. The backdrop to the study is the increasing reliance on partnerships with the private sector to deliver retirement accommodation, in the face of public sector reductions in both social and healthcare spending.

The findings of the SHSNOP are entirely consistent with the OWHNA in demonstrating the high level of need for retirement housing set against limited existing and planned stock provision. Table 3.1 of the report indicates an annual target of 103 retirement dwellings per annum within East Northants, which would equate to nearly a quarter of the annual average housing requirement for ENC (420 dwellings per annum under the JCS). This level of retirement housing is simply not being met, as recognised on page 30 of the report where a key message is that: *"There is a shortfall of retirement housing for sale and shared ownership."*

As mentioned above, due to the current lack of suitable accommodation for ageing residents, this is leading to significant under-occupation of the existing housing stock in the District. Paragraph 3.31 of the SHSNOP report explains the benefits to the housing market in providing 'downsizer' housing. Their research suggests that for every downsizing move, a further three house moves occur which releases more potential starter homes for people looking to enter or move up the housing ladder. The significant lack of current choice of suitable accommodation in Oundle and East Northants more widely is therefore restricting necessary 'churn' within the housing market.

The SHSNOP also recognises the contribution that Neighbourhood Plans can make to the delivery of specialist and private market retirement housing in paragraph 4.17. Therefore, this study also forms an important piece of evidence to support the pressing need for this type of accommodation which also underpins our position that Fletton Field should be allocated for residential development in policy O.16 of the Plan.

We trust the above representations are helpful in taking the draft ONP forward. We look forward to an ongoing dialogue with the Neighbourhood Plan Group and officers at ENC in respect of the progression of the Plan. Should you wish for clarification or further meetings to discuss any of the above, please do get in touch.

Yours faithfully

~~Senior Associate Planner~~

For and on behalf of
PETER BRETT ASSOCIATES LLP

cc ~~James Aldridge, Northamptonshire County Council~~
~~Richard Palmer, Planning Policy and Conservation Manager, East Northamptonshire Council~~

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